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Application **GRANTED IN PART**. The initial conference scheduled for September 13, 2023, is **CANCELLED**. Plaintiff shall file a motion for default no later than **September 27, 2023**. So Ordered.

Dated: September 8, 2023
New York, New York

A handwritten signature in black ink, appearing to read "Lorna G. Schofield", written over a horizontal line.

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

September 8, 2023

Via ECF

Hon. Lorna Gail Schofield
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Josh Withers v. SRmedia Digital Publishing LLC*
Docket No: 1:23-cv-06036-LGS

Dear Judge Schofield:

We represent plaintiff Josh Withers ("Plaintiff") in the above-captioned matter and write pursuant to Section I.B.3 of the Court's Individual Practices to respectfully request an adjournment *sine die* of the initial conference scheduled for September 13, 2023, in light of the default of defendant SRmedia Digital Publishing LLC ("Defendant").

1. The original conference is scheduled for September 13, 2023, at 4:10 p.m. [Dkt. No. 7];
2. Plaintiff seeks an adjournment sine die in light of Defendant's default and Plaintiff's pending application for entry of default;
3. No previous requests have been made or granted/denied;
4. The reason for the request is that Defendant is in default and Plaintiff's application for entry of default remains pending [Dkt. Nos. 16-17];
5. Defendant is in default and therefore neither opposes nor consents to this request.
6. The requested adjournment is made in good faith and not for purposes of delay, no other dates will be impacted by this request, and granting this request will not prejudice any party to this matter.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert